

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

**CITY OF JOHNSON CITY,
TENNESSEE, et al.,**

Defendants.

NOTICE OF LODGING DOCUMENTS UNDER SEAL

Plaintiffs hereby give notice that they are provisionally lodging an unredacted version of Plaintiffs' Motion to Compel Production of (1) Defendants' Financial Records and (2) the Real Estate Contract Between City Manager Cathy Ball and Sean Williams ("Plaintiffs' Motion") as well as Exhibits 15, 20, 29, and Exhibit 32 to the Declaration of Vanessa Baehr-Jones in support thereof under seal.

- Exhibit 15 is a redacted copy of Defendant Kevin Peters' Response to Plaintiffs' Second Set of Interrogatories and Requests for Production of Documents.
- Exhibit 20 is a copy of Skyline Restoration and Maintenance LLC Renasant Bank records.
- Exhibit 29 is an excerpted copy of Kevin Peters' deposition transcript in the Kateri Dahl litigation, *Dahl v. Turner*, 2:22-cv-00072-KAC-JEM.
- Exhibit 32 is a redacted copy of Defendant Jeff Legault's Responses to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents.

Sealed filing is appropriate for the reasons set forth in the Declaration of Vanessa Baehr-Jones, namely, (1) Exhibit 15 has been designated “Confidential” by Defendant Peters and he has stated he will file a motion for contempt if Plaintiffs’ counsel files the redacted version of this document publicly before holding a meet and confer regarding de-designation; (2) Exhibit 20 includes financial records with personal identifying information and account numbers; (3) Exhibit 29 is excerpted deposition testimony that remains “Confidential” in the *Dahl* litigation; and (4) Defendant Legault has not had a chance to review the redacted version of his Responses in time for the filing of this motion, and Plaintiffs are therefore filing this Exhibit under seal provisionally.

As the unredacted version of Plaintiffs’ Motion contains information from Exhibits 15, 20, 29, and 32 it must also be lodged under seal provisionally.

Plaintiffs therefore request the Court set a briefing schedule for any motions to seal which Defendants intend to bring, and in the interim, provisionally seal the unredacted version of Plaintiffs’ Motion as well as Exhibits 15, 20, 29, and 32, which are filed in support of Plaintiffs’ Motion to Compel Production of (1) Defendants’ Financial Records and (2) the Real Estate Contract Between City Manager Cathy Ball and Sean Williams.

Dated: June 27, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

Pro Hac Vice

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 27, 2024 to counsel of record:

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/s Julie C. Erickson
Julie C. Erickson